

## Construction Work-In-Progress (CWIP)

June 18, 2014



### Today's Speakers

- NOAA Financial Statements Branch (FSB)
  - Heather Potter
- ▶ Real Property Management Division (RPMD)
  - Lisa Williams
- Personal Property Management Branch (PPMB)
  - Katina Williams



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### Agenda

- Basic Information
  - Definitions
  - Roles and Responsibilities
  - Training Requirements
- Phase I: Planning (Setting up a CWIP Activity)
- Phase II: Construction (During a CWIP Activity)
- Phase III: Capitalization (Completion of a CWIP Activity)
- Updates to the CWIP Policy





## **Underlying Concepts**

 Obligations (delivered/undelivered) incurred by a program each fiscal year (FY) are either capitalized or expensed.

#### Expensed:

 Consumed within a period of one year or whose value is below the capitalization threshold

#### Capitalized:

- Acquisition of a capital asset, such as Property, Plant, & Equipment (PP&E)
- Assets purchased "off the shelf" are capitalized upon delivery (if they meet capitalization threshold)
- Some assets require time to deliver/complete or include costs associated with design, site preparation, planning, installation, etc. (constructed)

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#### What is PP&E?

- Property, Plant, & Equipment (PP&E) are tangible assets that:
  - Have an estimated useful life of two or more years;
  - Not intended for sale in the ordinary course of business; and
  - Intended to be used or available for use by the entity (FASAB SFFAS No. 6, "Accounting for PP&E", paragraph 17)
- NOAA's capitalization threshold: \$200,000
- ▶ PP&E (<u>non-CWIP</u>) should be recognized:
  - When title passes to the acquiring entity or
  - When the PP&E is delivered to the entity or an agent of the entity.



## What is PP&E? (cont.)

- Three major groups of PP&E: real property, personal property, and internal use software
  - Real property: Permanent improvements to land
  - Personal property: Equipment, temporary improvements to land, anything not real property (includes internal use software)
    - Internal use software: Application and operating system programs, procedures, rules, and any associated documentation purchased from commercial vendors "off-the-shelf," internally developed, or contractor-developed solely to meet the entity's internal or operational needs







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#### What is CWIP and IUSD?

Construction Work in Progress (CWIP) and Internal Use Software Development (IUSD):

(referred to as CWIP in this presentation)

- Temporary asset holding accounts used to track cost during the design and construction of PP&E
- Constructed—not bought as-is or off-the-shelf
- Capital asset on NOAA's financial statement included in PP&E on Balance Sheet
- Criteria for CWIP (must meet <u>all</u> four conditions):
  - Aggregate acquisition cost of \$200,000 or more, and
  - Estimated service life of two years or more, and
  - Long-term economic benefit to the organization that maintains or obtains control, and
  - Not intended for sale in the ordinary course of operations



### CWIP and IUSD? (cont.)

- IUSD is a "subset" of CWIP; therefore, must follow CWIP policy.
- PP&E shall be recorded as CWIP until <u>it is placed in</u> <u>service</u>, at which time the balance shall be transferred from CWIP to general PP&E.

(FASAB SFFAS No. 6, "Accounting for PP&E", paragraph 34)

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### Why do we care?

- Required by law.
  - Chief Financial Officers (CFO) Act of 1990
    - Required each executive branch agency to prepare annual financial statements
  - FASAB SFFAS 6, "Accounting for Property, Plant, & Equipment", SFFAS 10, "Accounting for Internal Use Software", and SFFAS 44 "Accounting for Impairment of General Property, Plant, & Equipment Remaining in Use"
    - Provides the guidance under which assets for the financial statements are reported



### Why do we care?

#### Material asset to NOAA

- CWIP made up 68% of NOAA's FY 2013 PP&E balance
- PP&E made up 69% of NOAA's FY 2013 total assets
- NOAA made up 87% of DOC's FY 2013 PP&E balance
- Amounts (in thousands) as of 9-30-2013 (post close):

NWS CWIP	\$ 39,882
NOAA CWIP	6,548,853
NOAA Total PP&E	9,701,634
NOAA Total Assets	14,061,191
DOC Total PP&E	11,103,844
DOC Total Assets	30,038,311



## Why do we care? (cont.)

- Significant Deficiency and several audit findings in FY 2013;
  Material weakness and several audit findings in FY 2012.
  - DOC will FAIL annual financial audit if NOAA's CWIP balances are not fairly stated.

#### Types of Audits:

- OMB A-123
  - Testing of internal control procedures (useful lives are based on predetermined criteria and proper authorization for disposal of assets).
- Financial Audit (CFO Audit)
  - Accuracy of information reported in the financial statements (<u>Performance Accountability Report (PAR)</u>) of the Department (acquisition costs, depreciation, future liability of non-cancellable leases).

## Challenges - FY 2014 & Beyond

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- Date costs transferred from CWIP to PP&E
- Completeness of CWIP
- Timeliness
- Non-compliance with CWIP Policy
- Impairments
- Review of CWIP Reconciliations
- Training
- Review of IPAC payments



### **CWIP Policy Update**



- In response to significant deficien, the CWIP policy is in the process of being updated.
- Updates will include:
  - Clarify capitalization requirements regarding third party overhead (Section 5.2).
  - Revised Section 5.3 Incidental and Administrative Costs (Indirect Costs – Overhead).
  - Revised Section 5.7 CWIP Activities Funded by Reimbursables.
  - Clarified supporting documentation requirements in Section 5.10 CWIP Documentation File.

### Roles and Responsibilities NOAA Finance Office



#### NOAA Finance Office (FO):

- Ensures that the policies are consistent with external requirements (e.g. FASAB)
- Issues, interprets, monitors, and maintains the CWIP policy
- Maintains the CWIP Activity database and generates reports from the database
- Runs and reviews CWIP-related reports (e.g. CA500D)
- Reviews CWIP reconciliations
- Reviews NF 37-6 forms
- Posts CWIP-related entries in CBS

## Roles and Responsibilities NOAA Personal & Real Property



- NOAA Personal and Real Property Offices (Personal Property Management Branch (PPMB) and Real Property Management Division (RPMD)):
  - Overall responsibility for oversight of NOAA's CWIP activities
  - Provides guidance on CWIP policy
  - Reviews and provides guidance to determine whether an activity will result in a CWIP activity and of the policies for capitalization of personal and real property
  - Reviews NF 37-6s and supporting CWIP documentation to ensure the accuracy of costs included in the CWIP asset
  - Monitors CWIP activities
  - Coordinates the mandatory CWIP training and tracks who has completed the training

## Roles and Responsibilities CFO/CAO



- Chief Financial Officer (L/SO CFO) and NOAA's CAO (Deputy CAO):
  - Ensures compliance with CWIP policy
  - Ensures all applicable CWIP activities are designated as CWIP at the start of the activity
  - Ensures a CWIP Activity Manager and a CWIP Project Manager is designated for each activity
  - Ensures all CWIP Activity and Project Managers complete mandatory
     CWIP training each fiscal year (online CLC Training)
  - Reviews and certifies CWIP reconciliations
  - Reviews and certifies all NF 37-6s prior to submission to Finance and the appropriate Property Office

## Roles and Responsibilities NOAA Line/Staff Office



- NOAA Line/Staff Office (L/SO):
  - Ensures compliance with CWIP policy
  - Provides construction requirements and funding
  - Ensures all CWIP requirements are met before expending the funds
  - Provides CBS depreciation accounting codes (organization code and project and task code) to the CWIP Activity Manager

## Roles and Responsibilities CWIP Activity Manager



#### CWIP Activity Manager (L/SO):

- Has overall responsibility for financial and budgetary actions involving the activity
- Adheres to CWIP policy
- Has CWIP critical element language in their performance plan
- Completes mandatory CWIP training each fiscal year
- Responsible for the accuracy of the valuation of the CWIP asset
- Maintains a complete and accurate CWIP documentation file
- Captures and allocates all costs correctly

## Roles and Responsibilities CWIP Activity Manager (cont.)



- CWIP Activity Manager (L/SO) (cont.):
  - Reviews the monthly CWIP Activity Database reports
  - Advises Finance of changes to activity information that need to be made to the CWIP Activity Database
  - Reviews CA500D report
  - Reconciles CWIP documentation file to CWIP report (CA500D)
  - Initiates action to record the CWIP costs as PP&E (NF 37-6)
  - Notifies Finance when project codes are complete
  - Notifies Finance when an activity is complete

## Roles and Responsibilities NOAA Project Manager



- CWIP Project Manager (L/SO):
  - Adheres to CWIP policy
  - Has CWIP critical element language in their performance plan
  - Provides construction management support
  - Provides needed CWIP documentation to the CWIP Activity Manager
    - CWIP Determination Letter for all NESDIS open activities
    - Estimated schedules, including dates and costs
    - Awards and obligating documents
    - Invoices
  - Completes mandatory CWIP training each fiscal year

## Training Requirements



- Mandatory training is required each fiscal year by all CWIP Activity Managers and CWIP Project Managers.
- New CWIP Activity/Project Managers must complete the training within one month of their appointment.
- LO CFO is responsible for ensuring the compliance and completion of the annual CWIP training.
- Training is online.
  - Commerce Learning Center (CLC)
- Training is in the process of being updated to address the changes in the policy.



### Critical Element Requirement



#### Per the CWIP Policy:

All CWIP Project and Activity Managers must have CWIP critical element language incorporated into their performance plans

- CWIP Element language can either be incorporated into another element or it can be a stand-alone element
- Minimum element weight is 5%, and the minimum element weight in the Five-Level Performance Management System is 15%
- Recommended that CWIP element constitute at least 15% but no more than 25%



### Overview of the CWIP Process

-Determining whether an activity is CWIP or not.

-Assigning a CWIP 60 Activity Manager and a CWIP Project
Manager
-Establishing a CV
activity in the CV

-Establishing a CWIP activity in the CWIP Activity Database.

-Establishing project codes.

-Tracking and capturing all the costs.

-Maintaining supporting documentation.

> -Performing reconciliations.

-Monitoring and updating the CWIP Activity database.

-Completing, reviewing, and certifying the NOAA Form (NF) 37-6, C "Report of Property Constructed".

-Recording the asset in the appropria property system and CBS.

-Closing out the CWIP activity.

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### Planning Phase

- Determining whether an activity is CWIP or not (L/SO, PPMB and RPMD)
  - Several items to consider:
    - To be capitalized?
    - CWIP Criteria
    - Capital Improvements
    - Bulk Purchases
    - Reimbursable Funds
    - Leasehold Improvements
    - Multiple Buildings
    - Demolition of Federal Buildings

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- Determining whether an activity is CWIP or not (cont.)
  - Expected to be capitalized by NOAA
  - Must meet <u>all</u> of the following four criteria for capitalization:
    - Aggregate acquisition cost of \$200,000 or more;
    - Estimated service life of two years or more;
    - Long-term economic benefit to the organization that maintains or obtains control; and
    - Not intended for sale in the ordinary course of operations
  - Determination should be made <u>prior</u> to any costs being incurred
  - Considered CWIP even if project construction and capitalization begin and finish in the same fiscal year



## Planning Phase (cont.)

- Determining whether an activity is CWIP or not (cont.)
  - Capital improvement projects should be evaluated to determine if they are CWIP or not
    - Consider whether the useful life of the asset is extended, or whether the project enlarges/improves the asset's service capacity
  - Bulk purchases should also be evaluated
    - An acquisition of a quantity of similar items individually costing \$25,000 or more, but less than \$200,000, and where the total monetary value of the one-time acquisition of those items is \$1 million or more

(http://www.pps.noaa.gov/New\_menu/bulk.htm)

- Reimbursable costs should not be recorded as CWIP
  - Costs should be considered in determining the estimate of the overall CWIP activity.

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- Determining whether an activity is CWIP or not (cont.)
  - Leasehold Improvements (including SLAs, RWAs, and interagency agreements): Improvements to leased property should be capitalized if the improvements meet the CWIP criteria for capitalization.
    - Entire buildings built on leased land are considered leasehold improvements
    - Depreciation lesser of useful life or lease term
  - Multiple Buildings
    - Renovation projects involving more than one asset should be identified up front in the determination letter
    - Structures should also be identified
      - Required to report structures such as parking lots separately for Federal Real Property Council (FRPC) reporting
    - Make sure names being used for buildings correspond to asset name in Federal Real Property Management (FRPM)

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- Determining whether an activity is CWIP or not (cont.)
  - Demolition of Federal Buildings
    - Screening process not required if asset is structure or current estimated fair value is less than \$50,000
    - Excess request/demolition identified 12-24 months in advance of need (usually in planning stage or annual validation)
    - RPMD develops RP disposition (non-demolition) costs for LO funding
    - Timing of disposal determined
    - Coordinate with Logistics Division for Personal Property disposition
    - SECO involvement needed to conduct Environmental Due Diligence (SECO Flow Chart)
    - Specialist prepares Title V checklist
    - Specialist transmits completed SF-118 to GSA for disposal
    - Letter from GSA with demolition approval

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- Determining whether an activity is CWIP or not (cont.)
  - Demolition of Federal Buildings (cont.)
    - LO coordinates contracts for demolition, and site restoration, and any environmental cleanup (if applicable), or the recipient completes the off site removal
    - Required supporting documentation to remove the property from RPM
       Database
      - GSA Letter
      - LO Excess Request
      - Copy of the excess property notification to the Department for screening



- Determining whether an activity is CWIP or not (cont.)
  - If unsure whether an activity is CWIP or if there is even the slightest possibility that an activity may be CWIP:
    - Contact the FO and the Property Offices for guidance
      - Helps to avoid considerable difficulties in getting the data corrected in CBS

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- Assigning a CWIP Activity Manager and a CWIP Project Manager (L/SO)
  - Mandatory CWIP training must be completed each fiscal year by both the CWIP Activity Manager and the CWIP Project Manager
  - Develop schedule(s) that identify significant events and milestones over the life of the CWIP Activity
  - Set up CWIP documentation file
  - Provide construction management
  - Responsible for financial and budgetary activities of the CWIP activity
  - Ensure the accuracy of the valuation of the CWIP asset(s)

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- Completing CWIP Determination Letter that documents why an activity is CWIP (L/SO)
  - Serves as documentation of the determination
  - Also serves to gather additional information regarding the activity.
    - Number of assets being constructed? (Personal Property)
    - Involving more than one building? (Real Property)
    - On leased land? (Real Property)
    - Disposal involved? (Real Property)
    - Completed CWIP Training?
  - Two templates one for real property activities and one for personal property activities.
  - Signed, at a minimum, by the CWIP Activity Manager and the appropriate Property Office

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## Planning Phase (cont.)

#### CWIP Determination Letter (cont.)

#### Includes:

- Type of asset(s) being constructed (i.e. personal property, real property, internal use software
- Description of CWIP Activity/Asset(s)
- Initial Cost Estimate
- Estimated Useful Life of Asset(s)
- CWIP Criteria
- Conclusion
- Additional information regarding the CWIP activity and/or asset(s) being constructed

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- CWIP Determination Letter (cont.)
  - Approved and signed off by CAO (PPMB and RPMD) within five business days of receipt.
  - Copies sent by CWIP Activity Manager to:
    - Activity Manager
    - Project Manager
    - LO CAO/CFO
    - Property Manager
    - CAO (PPMB/RPMD)
    - Finance Office
    - CIO, if Internal Use Software
  - Letter can be prepared months in advance.
  - Should be completed prior to setting up any project codes.



- Establishing a CWIP activity in the CWIP Activity database (L/SO, FO)
  - Database:
    - Identifies all open CWIP activities (real and personal)
    - Identifies all active CBS CWIP project codes linked to a CWIP activity
    - Identifies all active CBS CWIP project codes not linked to a CWIP activity
    - Tracks mandatory submissions of CWIP reconciliations
  - Success is contingent on L/SO support

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- CWIP Activity database (cont.)
  - L/SO completes "Request to Add or Modify a CWIP Activity Form", including:
    - Activity Number
    - Activity Title
    - Estimated Placed in Service Date
    - Estimated Cost
    - Project and Task Codes
    - CWIP Activity Manager
    - CWIP Project Manager
    - CWIP Reconciliation Preparer
  - Finance enters data into the CWIP Activity database based on this form prepared by the L/SO



#### Planning Phase (cont.)

- Establishing project codes (L/SO, FO)
  - Minimum of two unique CBS project codes:
    - CWIP project code to capture costs to be capitalized
    - Non-CWIP project code to capture costs to be expensed
  - Separate and distinct set of CBS project codes must also be established for annual cost adjustments of incidental and administrative costs from a funded non-CWIP related project code to a CWIP project code
  - One project code to one CWIP activity
    - Two different CWIP activities cannot use the same project code.
    - No shared codes

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#### Planning Phase (cont.)

- Establishing project codes (cont.)
  - Financial Management Center (FMC) completes Project Code Request
     Form

http://www.corporateservices.noaa.gov/finance/projtaskdwnld.html

- Ensure project type field is "CWIP" or "IUSD" for CWIP project codes
  - Required for inclusion in CBS CWIP report, CA500D
- Ensure project code structure is appropriate
  - OR&F appropriations
    - 2nd position of project code <u>must</u> be '4' (i.e. x4xxxxx)
  - PAC appropriations
    - 2nd position of project code <u>must</u> be '2' and 4<sup>th</sup> position of project code <u>must</u> 'F' (i.e. x2xFxxx)

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#### Planning Phase (cont.)

- Establishing project codes (cont.)
  - FMC forwards completed forms, including approved CWIP Determination Letter, if applicable, to Headquarters CWIP Budget Coordinator
  - L/SO Headquarters Office reviews and approves:
    - Project code request form, and
    - Request to Add or Change CWIP Activity form (Database form)
  - L/SO Headquarters enters/saves the CWIP/IUSD project code in CBS on CM004 screen but does not approve or activate the project code
  - L/SO Headquarters Office forwards to Finance (Financial Statements Branch) the following forms:
    - Project code request form,
    - Request to Add or Change CWIP Activity form (Database form), and
    - CAO-approved CWIP Determination Letter (for <u>new</u> CWIP activities only)

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#### Planning Phase (cont.)

- Establishing project codes (cont.)
  - Finance reviews the forms to:
    - Ensure that the CWIP Determination letter and the project code request form contain the proper concurrences from CAO and L/SO, respectively
    - Ensure proper format of the project code structure
    - Ensure that the CWIP Determination letter is completed at the start of a CWIP activity
  - Finance contacts L/SO, if corrections are needed
    - Depending on the nature of the correction, corrections will be made either (I) by Finance with email confirmation of changes from the L/SO or (2) by the L/SO
  - Finance updates the CWIP Activity Database
  - Finance approves and activates CWIP/IUSD project codes in CBS (CM004) within one business day of receipt of forms (pending access to CBS and extent of errors)

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#### Construction Phase

- Tracking and capturing all the costs (L/SO)
  - PP&E should be recorded at cost. Cost shall include all costs incurred to bring PP&E to a form and location suitable for its intended use
  - Cost of PP&E may include
    - amounts paid to vendors
    - transportation charges to the point of initial use
    - handling and storage costs
    - labor and other direct or indirect production costs (for assets produced or constructed)
    - engineering, architectural, and other outside services for designs, plans,
       specifications, and surveys
    - acquisition and preparation costs of buildings and other facilities

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- Tracking and capturing all the costs (cont.)
  - Cost of PP&E (cont):
    - An appropriate share of the cost of the equipment and facilities used in construction work
    - Fixed equipment and related installation costs required for activities in a building or facility
    - Direct costs of inspection, supervision, and administration of construction contracts and construction work
    - Legal and recording fees and damage claims
    - Fair value of facilities and equipment donated to the government
    - Material amounts of interest costs paid
       (FASAB SFFAS 6, "Accounting for PP&E", paragraph 26)

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- Tracking and capturing all the costs (cont.)
  - Examples of costs that should be included in CWIP for capitalization are (but not limited to)
    - Labor costs for design and engineering
    - Actual contact costs with modifications for architectural and engineering contract design
    - Storage costs of Government Funded Equipment (GFE) delivered prior to installation date
    - Construction contract and all modifications
    - Materials and all actual labor associated with construction
    - Incidental and administrative costs representing labor for procurement, finance, supervisory, clerical and all other non-labor administrative costs (Rates used are 3% and 5%)
    - Direct labor, leave, and benefits
    - Construction and installation costs



- Tracking and capturing **all** the costs (cont.)
  - It is the CWIP Activity Manager's responsibility to ensure that all costs, both capital and expense, are captured and allocated correctly
  - CWIP Activity Managers are responsible for reviewing all obligating documents and determining that each cost charged to a CWIP activity is correct
    - Capitalized as CWIP and assigned to the CBS CWIP project code, or
    - Expensed as non-CWIP and assigned to the CBS non-CWIP project code
  - Create a spreadsheet to track expenses

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- Tracking and capturing all the costs (cont.)
  - PP&E that is integral to the CWIP asset should be included in the cost of the CWIP asset when it meets the following two criteria:
    - PP&E is built into the CWIP asset such that its removal would damage the CWIP asset or the PP&E or impair the intended use of the CWIP asset or the PP&E and
    - PP&E is immaterial relative to the related CWIP asset
      - · When determining materiality, both cost and useful life should be considered
  - PP&E that is non-integral:
    - If it <u>meets</u> the capitalization threshold, should be capitalized as a separate asset
    - If it <u>does not meet</u> the capitalization threshold, should be expensed and recorded as accountable property

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- Tracking and capturing all the costs (cont.)
  - Examples of costs that should not be included in CWIP and should be expensed are (but not limited to):
    - Planning activities that do not result in final design
    - Ordinary administrative supplies (e.g. copy paper, office equipment)
    - PP&E constructed for Research and Development intended as experimental, changing product rather than as a finished product
    - Personal property equipment used for administrative support
    - Non-integral PP&E not meeting capitalization threshold
    - Spare parts
    - Outfitting costs that do not meet the capitalization threshold

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- Tracking and capturing all the costs (cont.)
  - Reimbursable Costs
    - Included in the total value only if the MOU transfers or identifies the asset as belonging to NOAA at the end of the construction period
    - Project code structure will not follow the unique CWIP structure
    - Project codes should be setup and accounted for as reimbursables
    - Reimbursable amounts should be reported to Finance quarterly
    - At the end of the CWIP activity:
      - Portion of CWIP asset funded by the reimbursable sponsor should be "transferred" to NOAA
      - NF 37-6s must include the NOAA portion (the CWIP project codes) <u>and</u> the "transferred-in" portion from the reimbursable sponsor

- Tracking and capturing all the costs (cont.)
  - Incomplete CWIP/Impairments
    - Impairment: a significant and permanent decline in the service utility of general PP&E or expected service utility for CWIP (FASAB SFFAS 44)
    - CWIP activity or a part of the activity will never be completed or has become nonviable
    - CWIP Project Managers must complete the Impairment Checklist (web) at a minimum annually
      - However, if a CWIP Project Manager is aware that something has occurred that may be an impairment, a checklist should be completed even if it has been less than a year since the last time a checklist was completed.
    - CWIP Activity Managers must review the Impairment Checklist
    - If an impairment is noted by the CWIP Project Manager, then an impairment analysis should be performed to determine the amount of the impairment



- Tracking and capturing all the costs (cont.)
  - Incomplete CWIP/Impairments (cont.)
    - CWIP Activity Manager must notify Finance of impairments via the quarterly data call
    - CWIP costs are reduced to reflect expected net realized value and recognize impairment losses (if any)
    - Impairment loss shall only be recognized if the net book value of a long-lived asset is not recoverable and exceeds its fair value



- Maintaining supporting documentation (L/SO)
  - Two files:
    - CWIP Activity Manager's file
    - Documentation due to the Property Office
  - CWIP Activity Manager is responsible for maintaining adequate supporting documentation



Documentation Req.	CWIP Activity Manager's File	Property File
CWIP Determination Letter	✓	✓
Acceptance documentation or BOD letter	✓	✓
Annual SLTs for incidental and administrative costs, if applicable	✓	√ (not annual)
CBS CWIP Report (CA500D) and other related CBS accounting reports	✓	<b>√</b>
Copies of invoices to support amounts reported on the NF 37-6	✓	N/A
CBS labor reports	✓	N/A
CBS cost reports	✓	N/A



Documentation Req.	CWIP Activity Manager's File	Property File
Copies of construction or production contract (including Statement of Work), copies of CBS bankcard statements, all modifications, and both partial and final invoices	<b>√</b>	Contract and any mods that contain amount and deliverables
Copies of travel vouchers for inspections or design review	✓	N/A
Copies of architectural and engineering contract task orders and related invoices	✓	N/A
Bills of lading for transportation charges	✓	N/A
Copies of contracts for construction management services and related invoices	✓	N/A



Documentation Req.	CWIP Activity Manager's File	Property File
Copies of billing for space charges for storage costs for Government Funded Equipment (GFE) delivered prior to installation date	✓	N/A
Copies of invoices for duplicating drawings and specifications for final design	✓	N/A
Copies of purchase orders, Receipt and Inspection Reports and related invoices for materials purchased for in house construction	✓	N/A
NF37-509 "Property Transaction Report" (personal property only)	✓	<b>√</b>



Documentation Req.	CWIP Activity Manager's File	Property File
Transfer documentation, if applicable	✓	✓
Useful life certification following Real/Personal Property guidance and corresponding to the useful life on the NF 37-6	N/A	<b>√</b>
Spreadsheet tying obligating documents to the asset cost on NF 37-6.	✓	<b>✓</b>
Completed FRPM data entry form (real property)	N/A	✓

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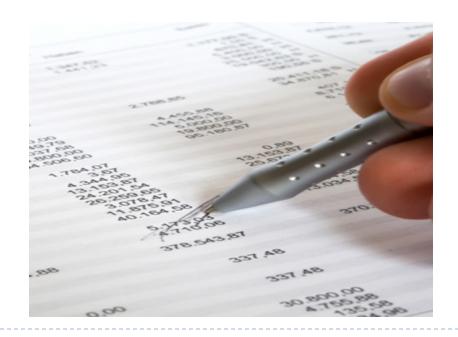
- Maintaining supporting documentation (cont.)
  - Property Offices reserve the right to request additional detailed information
  - Concerns related to documentation:
    - Correct Acquisition Cost
    - Valid Acquisition Organization Code(s) and Project and Task Code(s)
    - Valid Depreciation Organization Code and Project and Task Codes(s)
    - Signed forms



- Performing reconciliations of the CWIP Documentation File to CBS CWIP Report (CA500D) (L/SO)
  - Independent verification of CWIP balances, by project and task code, on the CBS CWIP Report (CA500D)
  - CWIP Activity Managers must prepare a reconciliation of their Uncapitalized Cost balances - by project and task code and CWIP activity.
  - CWIP Reconciliation Template (web)
  - Reviewed, approved and signed by L/SO CFO/M&B Chief or NOAA
     CAO/Deputy CAO (if activity is OCAO-designated)
  - Send scanned copies and Excel versions of the reconciliations to Finance



- Reviewing the reconciliation (FO)
  - Determine if any adjustments need to be made to the CBS CA500D report
  - Make any necessary revisions to CBS



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- Monitoring and updating the CWIP Activity Database (L/SO, PPMB, RPMD, and FO)
  - Finance posts monthly reports to the Web
  - Finance conducts a certification of database information annually
  - Finance follows-up with L/SOs regarding project codes that:
    - Are not linked to a CWIP activity
    - Have negative CWIP balances
    - Meet the purge criteria
    - Are CWIPC/IUSDC, but do not meet the purge criteria
  - PPMB and RPMD follows-up with L/SOs on activities, for example, that have:
    - Estimated BOD/acceptance dates that have expired
    - Estimated BOD/acceptance dates that are in the near future
  - L/SO should notify Finance of any changes to an activity

# NORA THOSO PROPERTY OF COMMENT OF

- Completing the NF 37-6 form (L/SO)
  - NF 37-6 is used to transfer CWIP costs into a capitalized asset account (e.g. buildings and structures, equipment)
  - Three conditions require submission of a NF 37-6:
    - Constructed PP&E is placed in service (initial NF 37-6)
    - For a CWIP asset already placed in service or a completed phase/milestone of the asset has already been reached, uncapitalized costs is expected to reach the lessor of \$1.0 million or 10% of the total cost incurred to date within the FY (revised NF 37-6)
    - When UDO equal \$0, unpaid costs equal \$0, no further costs are expected, and there are uncapitalized costs (i.e. CWIP activity is complete) (final NF 37-6)

## NORA NUMBER OF COMMENT OF COMMENT

- Completing the NF 37-6 form (cont.)
  - Placed in service date:
    - Real property = Beneficial Occupancy Date (BOD)
    - <u>Software</u> = Date final acceptance testing has been sucessfully completed in a production environment
    - <u>Satellite ground systems</u> = Date when the possession and operations of the asset are handed over to a NESDIS operating organization.
    - NOAA satellite sensors/instruments on a non-NOAA owned satellite = Date when the data is declared and determined operational by the user community (i.e. NESDIS Program Office(s), other NOAA L/SOs, or non-governmental end users).

# NORA NAME OF COMMENT O

- Completing the NF 37-6 form (cont.)
  - Placed in service date (cont):
    - NOAA owned satellite and sensors/instruments = Date after successful launch and the satellite successfully passes NESDIS Calibration and Validation (Cal/Val) or in-orbit testing. Data from all of the instruments on the satellite has to be determined operational and being received by the user community.
    - Types of assets not listed above = Select appropriate placed in service date and document the reasons that date represent the placed in service date
    - Significant events and/or milestones may be used to determine placed in service date
    - Case-by-case exceptions to these guidelines must be approved by L/SO
       Headquarters Office, FO, and the appropriate Property Office

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- Completing the NF 37-6 form (cont.)
  - For 2<sup>nd</sup> and 3<sup>rd</sup> conditions, the Property Offices will monitor the CWIP Activity Database 306 report monthly to determine if a NF 37-6 should be submitted
    - Within a week, the Property Office will notify the L/SO.
    - Notification from the Property Office will serve as the starting point for the timeline; however, it is the L/SO's responsibility to submit the NF 37-6
  - If significant additional costs are anticipated before the end of the fiscal year, the Property Office, Finance, and the L/SO can together make a determination to defer the revised NF 37-6 to a specific date within the fiscal year
  - In addition, Finance or the Property Offices may request a revised NF 37-6 for instances that do not meet the 2<sup>nd</sup> condition if they deem it necessary due to materiality, timeliness or audit risk

# NORA NAME OF COMME

- Completing the NF 37-6 form (cont.)
  - Subsequent NF 37-6s (after the initial NF 37-6) should be entered into the appropriate system using the appropriate useful life and acquisition date
  - Does not include unpaid obligations or accruals
  - For assets with milestones:
    - NF 37-6 should include costs incurred to date
  - For CWIP activities with multiple assets:
    - NF 37-6 should be completed when each asset is placed in service
  - Certified by CWIP Activity Manager and L/SO CFO or NOAA
     CAO/Deputy CAO (if activity is OCAO-designated).
  - Send scanned copy and Excel version of the signed NF 37-6 to Finance



- Completing the NF 37-6 form (cont.)
  - Placed in Service Date or Email Notification from the Property
     Office dated between October 1 through July 12:
    - 40 calendar days for LO to forward completed NF 37-6 to Finance
    - 10 calendar days for Finance to review and approve NF 37-6
    - 30 calendar days for Property Office to review and approve NF
       37-6
    - 10 calendar days for Finance to process General Journal (GJ) upon receipt of final NF 37-6
    - Entire process should not exceed **90 calendar days** after the asset was placed in service or an email notification from the Property Office

- Completing the NF 37-6 form (cont.)
  - July 13 through August 31:
    - NF 37-6 must be submitted to Finance by September 10
  - September I through September 30:
    - Estimated NF 37-6 is required
  - For NF 37-6s submitted to Finance after August 11
    - Finance and Property Offices' reviews will be adjusted to ensure that the NF 37-6 will be processed by year-end
  - Will be reported in a quarter if the NF 37-6 is:
    - Signed by Finance by the last day of the quarter-end, and
    - Signed by the Property Office by the second business day of the following month

### NORA PROPERTY OF COMMENT OF COMMENT

- Reviewing and certifying the NF 37-6 (FO)
  - Reviews the NF 37-6 for clerical accuracy
  - Reviews project codes
  - Verifies that the depreciation project code is valid and active
  - Verifies that amounts on the NF 37-6 do not exceed current balances on the CBS CWIP Report (CA500D)
    - If insufficient "Uncapitalized Costs" exist, the CWIP Activity Manager will be notified
  - Does not review any supporting documentation file
  - Does not certify the accuracy of the costs charged to and included in the activity
  - Certifies the NF 37-6
  - Sends scanned copy to L/SO with a copy to the appropriate Property Office

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- Reviewing the NF 37-6 and supporting documentation (PPMB/RPMD)
  - L/SO submits required supporting documentation to the appropriate
     Property Office
    - Can be submitted early
    - Must be submitted upon receipt of email from Finance
  - PPMB/RPMD reviews the NF 37-6 and supporting documentation:
    - Completeness
    - Accuracy
    - Costs accurately reported (capitalized vs. expensed)
  - PPMB/RPMD certifies the NF 37-6
  - Sends a scanned copy to Finance and the CWIP Activity Manager



- Recording the asset into the appropriate property system (PPMB/RPMD)
  - Either prior to or shortly after signing the NF 37-6
    - Sunflower
    - FRPM
- Recording the asset in CBS (FO)
  - Upon receipt of certified NF 37-6 from the Property Office(s)
  - Removes cost from CWIP account and puts it in a PP&E account
  - After transaction is recorded, costs will appear in the "Capitalized Cost" column on the CA500D report

#### An Overview of the CWIP Process Per the Property Office



-CWIP Activity
Database
(CWIPDB 306 B/C)
-UPR Payments

-NF 37-6 and related supporting documentation (including NF37-509)

-Recording asset in property system

 Conversations, meetings, etc. with LO Representatives

-Determination Letter

Planning Phase

Construction Phase

### Recording Asset in Sunflower



- The Property Custodian (PC) obtains the Sunflower Catalog data from the Sunflower Help Desk and enters the asset information in the Edit Interface.
- The CWIP Activity Manager and PC provide the NF37-509, NF 37-6, and other supporting documentation to PPMB.
  - NESDIS- All documentation packages are submitted to HQS
- The monthly 306B report for CWIP is reviewed and:
  - Follows up on the status of projects
  - Requests initial, revised or final NF 37-6 where applicable

### Recording Asset in Sunflower (cont.)



- Sunflower will notify PPMB Financial Team that the asset was entered as an inventory record
- The Finance Office will capitalize the asset within 10 working days from the date it was entered into Sunflower



#### Parent-Child Relationships

- The parent is a financial asset, and the child can be either a non-financial asset or another financial asset
- Each parent and child receives its own barcode, and the "children" barcodes are tied to the "parent" barcode in Sunflower





## Parent-Child (cont.)

- A child asset can be designated as a financial asset and be capitalized based on its own acceptance date and useful life
  - When capitalized separately, the value of a child asset is not included in the value of the parent asset
- Parent-child relationship is affected by whether the child asset is integral or non-integral to the parent. Property Bulletin #004, FY 2012 was issued with guidance on parentchild assets.





## Capitalization Phase (cont.)

- Closing out the CWIP activity
  - Database
    - Only UDOs remain only COR can work with AGO to resolve
    - Notify Finance when an activity is complete so that it can be marked as "Completed" in the CWIP Activity database
  - Purge Codes
    - Notify Finance to change project type in CBS to CWIPC or IUSDC
      - Required to meet CBS CWIP Report (CA500D) "Purge" criteria

# NORA PROPERTY OF COMMENT OF COMME

## Updates to the CWIP Policy

- Policy update by June 30
  - Clarifies Section 5. I, Capitalized Costs, regarding overhead charged to NOAA by third parties, specifically another federal agency.
  - Revises Section 5.3, Incidental and Administrative Costs
    - Renamed to NOAA Corporate Services Overhead Allocation
    - New methodology
  - Revises Section 5.7, Reimbursables.
  - Revises Section 5.10, CWIP Documentation File, regarding invoices or sufficient third party documentation.
  - Removes the CWIP Responsibility Memo as an appendix.
- Any proposed revisions to the policy should be sent to Finance for consideration.

# NORA NAME OF COMMENT O

#### Resources

- CWIP Web site
  - Policy
  - Checklists, Fact Sheets, Forms and Templates
  - CWIP Activity Database reports
- PPMB Web site
- RPMD Web site
- ► FASAB Standards
- CFO Act



### **NWS CWIP Contacts**



**CWIP** 

Tamara Lewis

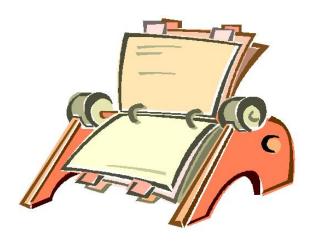
301-427-6924

Tamara.Lewis@noaa.gov

**PROPERTY** 

Janice Evans 301-427-6920

Janice. Evans@noaa.gov



## PPMB & RPMD Contacts



Katina Williams 301-713-3530 ×128

Katina.Williams@noaa.gov

Lisa Williams 301-713-0927 ×104

Lisa.Williams@noaa.gov



#### **Finance Office Contacts**



Mark P. Miller 301-444-2704

Mark.P.Miller@noaa.gov

Melvin Spencer 301-444-2128

Melvin.L.Spencer@noaa.gov

Jones Harbor 301-444-2133

Jones. Harbor@noaa.gov

Heather Potter 301-444-2158

Heather.L.Potter@noaa.gov





## Questions?





## Supporting Slides



# NORA NAME OF COMME

#### SGL Accounts

- ► 1711: Land (Real Property)
- ▶ 1712: Land Improvements (Real Property)
- ▶ 1719:Accumulated Depreciation on Land Improvements
- ▶ 1720: Construction Work-in-Progress (CWIP)
- 1730: Buildings and Structures (Real Property)
- ▶ 1739:Accumulated Depreciation on Buildings and Structures
- 1750: Equipment (Personal Property)
- ▶ 1759:Accumulated Depreciation on Equipment
- 1810: Capital Leases (Personal and Real Property)
- ▶ 1819:Accumulated Depreciation on Capital Leases
- 1820: Leasehold Improvements (Real Property)
- ▶ 1829:Accumulated Depreciation on Leasehold Improvements
- ▶ 1830: Internal Use Software (Personal Property)
- ▶ 1832: Internal Use Software in Development (IUSD)
- 1839:Accumulated Depreciation on Internal Use Software

## Contacts for Determination Letter



- Points of contact for Personal Property are:
  - Primary: Katina Williams
  - Alternate: Larry Oates
- Points of contact for Real Property are:
  - Eastern Region Primary: Nancy King
  - Eastern Region Alternate: Marc Rappaport
  - Western Region Primary: David Garton
  - Western Region Alternate: Marc Rappaport
  - Copied on all submissions: Lisa Williams

## Contacts for Project Code Approval

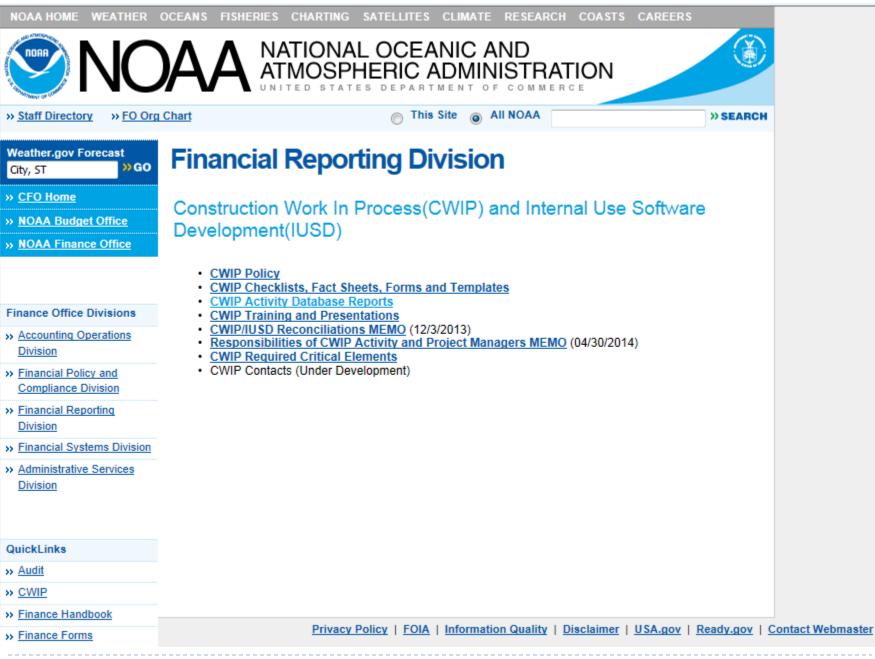


- Points of contact for Finance are:
  - Primary: Jones Harbor
  - CC: Melvin Spencer and Heather Potter
  - High Priority Items CC: Mark Miller



### Project Code Request Form

FY 2007 CBS Project Code Request Form						
No.	Item	Value				
1	CBS Project Code					
2	Project Title					
3	Project Type					
	CBS Fund Code Listing for Project Types	http://www.corporateservices.noaa.qov/~finance/FO FRD.html				
4	CBS Fund Code					
	CBS Fund Code Listing for Fund Codes	http://www.corporateservices.noaa.qov/~finance/FO FRD.html				
5	Fund Title					
6	CBS Program Code					
7	Program Title					
8	Direct/Reimbursable Flag					
	CBS Fund Code Listing for D/R Flag	http://www.corporateservices.noaa.qov/~finance/FO FRD.html				
9	Effective Begin Date					
10	Effective End Date					
11	WIP (Work in Process)  Select "Yes if Costs incurred for the project will be allocated by the Work In Process (WIP) allocation algorithm that assigns costs to customer orders. Select "No" if this is a	Yes or No				



# Weather.gov Forecast City, ST >>> CFO Home >>> NOAA Budget Office >>> NOAA Finance Office

#### Financial Reporting Division

**CWIP Activity Database** 

**CWIP Database Flowchart** 

**Descriptions of CWIP Activity Database Reports** 

Request to Add or Modify a CWIP Activity Form

Reports:

(As of May 31, 2014)

CWIPDB 100	Open CWIP Activities – Basic Information (PDF file)
CWIPDB 100	Open CWIP Activities – Basic Information (Excel file)
CWIPDB 102	Open Personal Property CWIP Activities – Basic Information
CWIPDB 104	Open Real Property CWIP Activities – Basic Information
CWIPDB 106	CWIP Activity and Project Managers
CWIPDB 108	Personal Property CWIP Activity and Project Managers
CWIPDB 110	Real Property CWIP Activity and Project Managers
CWIPDB 112	Open CWIP Activities by Line Office
CWIPDB 114	Dates for Open CWIP Activities
CWIPDB 200	Open CWIP Activities and Active CBS Project Codes
CWIPDB 202	Active Project Codes and Open CWIP Activities
CWIPDB 304	Not Linked TBD Information

#### **Finance Office Divisions**

- » Accounting Operations <u>Division</u>
- » Financial Policy and Compliance Division
- » Financial Reporting Division
- >> Financial Systems Division
- » Administrative Services Division

#### QuickLinks

- >> Audit
- » CWIP
- >> Finance Handbook
- >> Finance Forms
- » Internal Controls
- >> Motorpool
- » Object Class
- >> Policy
- » Purchase Cards
- » Travel
- >> Unasserted Claims
- » Year End



## Database Form (Excerpt)

#### Request to Add or Modify a CWIP Activity Form (Updated 5/2012)

WIP ACTIVITY INFORMA	HON:					
Activity Number:						
Activity Title:						
Line/Staff/Corporate Office	that is managing th	ne CWIP Activ	rity:			
What type of property is the	is activity for:	Real 🔲	Personal (including IUSD)			
Estimated CWIP Activity E	Beneficial Occupanc	y Date (BOD)	/Acceptance Date:			
Estimated CWIP Activity A	Amount (obligation )	under CWIP):				
+CBS Fund Code(s), Project	Code(s), and Task/I					
Project Code	Task Code		reviously ed Code			
Estimated total number of capitalized assets in this CWIP activity:						
CWIP Reconciliation Preparer Information: Name:						
Phone Number:						
Email Address:						
CWIP Activity Manager In	formation:					

#### Insert Routing Code

March 5, 2012

MEMORANDUM FOR: The Personal Property Record

Personal Property Management Branch (PPMB)

FROM: Line/StaffOffice

Insert CWIP Project Manager's Name

CWIP Project Manager

Insert CWIP Activity Manager's Name

CWIP Activity Manager

Insert Property Custodian's Name and Custodial Area, if known

Property Custodian

Insert CFO/CAO's Name

Chief Financial Officer/Chief Administrative Officer (if OCAO activity)

SUBJECT: Initial Determination for Construction Work-in-Progress CWIP)

CWIP ACTIVITY TITLE: Insert the CWIP Activity's Official Name

REFERENCE: NOAA's CWIP Policy and Procedures Manual

Based upon my review of NOAA's CWIP Policy and Procedures Manual and the information below, it is my initial determination that the subject activity qualifies as a Personal Property CWIP activity, and the provisions outlined within the CWIP Manual will be followed to account for appropriate expenditures.

According to NOAA's CWIP Policy and Procedures Manual, CWIP is a temporary holding account used to track costs during the design and construction activities of property, plant, and equipment (PP&E). In order to be considered a CWIP activity, a construction project must meet <u>all</u> of the following criteria for capitalization:

NOAA Form (NF)37-6 (Revised 3/2010 - Previous Editions Obsolete)							
Department of Commerce - National Oceanic & Atmospheric Administration							
	RE	PORT	OF PROPERTY CONS	TRUCTED		Beneficial Occupancy Date (BOD) and/or Acceptance Date:	
TO: NOAA FO & Property, Facilities & Logistics Office (E-mail scanned copy, PDF format)			TYPE	TYPE OF A SSET:			
							_▼
FROM: (E	nter LO CFO o	or CAO (De	puty CAO)	•	=	Status of Asset	Expected Useful Life of Asset (In years)
Personal/	Real Property	Identifying	Code Number(s):			Din Use	2 Years
						□ Not in Usic	2 han
Desc riptio	on of Asset:					Type of NF 37-8: select one	Estimate/Proliminary NP 37-5
							☐ Find NF 37-6
_	setis Under:						Revised NF 37-6
Fund Code(s)	Project Code(s)	Task Code (s)	Cost Previously Capitalized on Prior NF 37-6 dated	Cost to be Capitalized per t 37-6	this NF	Total Capitalized Cost	Obligating Document Number
						\$0.00	
						\$0.00	
						\$0.00	
						\$0.00 \$0.00	
						\$0.00	
						\$0.00	
						\$0.00	
						\$0.00	
						\$0.00	
						\$0.00	
						\$0.00	
						\$0.00	
						\$0.00	
						\$0.00	
						\$0.00	
						\$0.00 \$0.00	
TOTALS			\$0.00		\$0.00	\$0.00	
		ie ntal c lear	ances related to this property?		+	(If YES, please identify by attaching	ga se parate sheet)
Comment	5:						
			REPORT OF PROPER	TY CONSTRUCTE	D	ASSET CERTIFICATION	ONS
			CBS Depreciation C	Organization Code(s)		CBS Depreciation Proje	ct Code(s) and Task Code(s)

#### NF37-509- Property Transaction Request



U.S. Department of Commerce

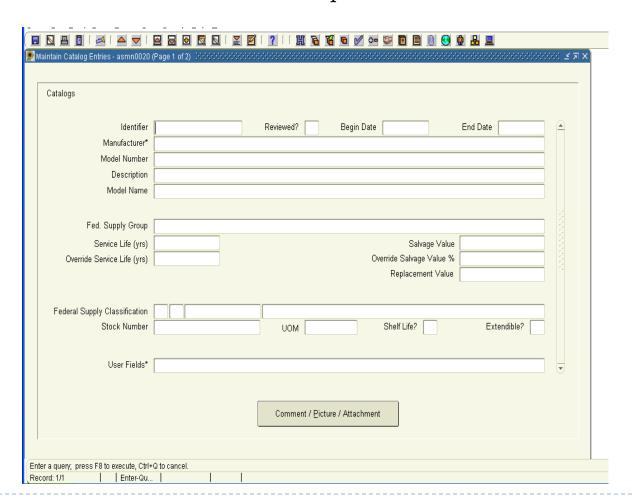
NOAA Form 37-509 Revision 07-2013

#### **Property Transaction Request**

	Property Custodian Code		Transaction Reque organization)	est Number (Internal to		
	1. Addition Type:  New Acquisition Inventory Adjustment Other  Describe					
on	Sunflower Catalog Number	Description of Per	rsonal Property			
Description	Manufacturer	Model Number		Serial Number		
	DOC Barcode Number	Asset Catego	ry	Useful Life		
ion		lumber				
Location	Street Address City	County	S	tate Zip		
	Document Type (Check One)  Purchase Order	GSA Fedstrip	Leases F	Rentals Other		

#### Useful Life

The Sunflower Catalog Useful Life should be used. If no catalog has been created then the Sunflower help desk should be consulted.





Insert Project Manager's Address

Insert Routing Code

March 5, 2012

MEMORANDUM FOR: Real Property Management Division (RPMD)

FROM: Line/Staff Office

Insert CWIP Project Manager's Name

CWIP Project Manager

Insert CWIP Activity Manager's Name

CWIP Activity Manager

Insert Chief Financial Officer's/Chief Administrative Officer's Name Chief Financial Officer/Chief Administrative Officer (if OCAO activity)

SUBJECT: Initial Determination for Construction Work-in-Progress (CWIP)

CWIP ACTIVITY TITLE: Insert the CWIP Activity's Official Name

REFERENCE: NOAA's CWIP Policy and Procedures Manual

Based upon my review of NOAA's CWIP Policy and Procedures Manual and the information below, it is my initial determination the subject project qualifies as a Real Property CWIP activity, and the provisions outlined within the CWIP Manual will be followed to account for appropriate expenditures.

According to NOAA's CWIP Policy and Procedures Manual, CWIP is a temporary holding account used to track costs during the design and construction activities of property, plant and equipment (PP&E). In order to be considered a CWIP activity, a construction project must meet all of the following criteria for capitalization:

#### US Department of Commerce

## National Oceanic and Atmospheric Administration (NOAA) Real Property Internal Control Policy Useful Lives

Purchases of \$200,000 or more, with an estimated useful life of 2 or more years are capitalized. As the useful lives of these assets decline through either physical wear and tear from operations, and/or deterioration, they are depreciated. SFFAS #6 defines useful life as the "normal operating life in terms of utility to the owner." Moreover, it is the period that the property is expected to be economically useable by the entity.

The useful life of an asset can be based upon the "IRS, Recovery Period for Common Assets" and the guidelines from OMB Circular A-76 Supplement, Appendix C that is used for capital improvements.

Buildings and Structures

	<ul> <li>-Temporary Buildings and Structures</li> </ul>	10 Years
	<ul> <li>Wood Building and Structures</li> </ul>	20 Years
	-Metal and Prefab Buildings/Structures	30 Years
	<ul> <li>Masonry Buildings and Structures</li> </ul>	40 Years
•	Construction Materials	40 Years
•	Electrical Power and Distribution Systems	15 Years
•	Plumbing Fixtures and Accessories	15 Years
•	Heating, Air Conditioning and Ventilation	10 Years
•	Industrial Boilers	10 Years
•	Dryers, Dehydrators, and Anhydrators	10 Years

### Decision Tree: Integral vs. Non-Integral



